

FAO: David Eaves

Havant Planning

Date: 05 June 2025

Dear David

Please find attached additional and updated information relating to application APP/21/00601 Portsmouth Water, Solent Road, Havant.

SLR Arboricultural Team have provided a new Tree Survey and Arboricultural Impact Assessment in line with BS 5837:2012 – Trees in relation to design, demolition and construction Recommendations' (BSI, 2012) – as the previous report is now out of date at over 2 years old.

Please note that the tree numbering on the new report is slightly different to the original report and plans and therefore any comparison on identifying tree numbers should be avoided.

We have also provided for your information an updated landscaping plan to align with the Arboriculture report.

The proposed development will require the removal of the following:

- One category A (T7), one category B (T37) and five category C trees (T15, T16, T17, T18 & T30 (T30 is subject to TPO HBC_1801)).
- One category B (G29 (4 x trees), subject to TPO HBC_1801) and one category C tree group (G8).

Along with the partial removal of:

- One category C hedgerow (H27).
- One category C tree group (G14).

In summary there will now only be **5No.** trees removed that are subject of TPO No.1801.

Further details on tree removal have been provided in the AIA report.

Report:

- Portsmouth Water HQ_Arboricultural Baseline & AIA Report
- TP_015A_Proposed Landscaping Plan_23002

Delivery Noise Management Plan TRC February 2022 470892.0000.0000

This report would not normally be required for applications relating to offices and as such, in its original form mainly related to the new commercial units and their relationship with the residential units. More specific requirements could be covered in a condition for a contractor to address once one has been appointed, as this document is very much just advisory.

The main points which remain relevant are the minimisation of noise from any plant or equipment installed on site; for early deliveries, ensuring drivers turn off engines and reversing alarms; avoid any unnecessary noise from unloading, and drivers to refrain from using vehicle horns. These arrangements are all in place for the current HQ.

Due to the date of the original report it is not possible to have this updated; however, all the requirements for the HQ building remain relevant.

External Finishes Materials Sample Board

The External Finishes Materials Sample Board has been amended to omit the commercial buildings.

Reports:

- External Finishes Materials Sample Board Amended

Planning Statement

We have included an update reflecting the current proposal and policy position in relation to the current NPPF and Havant's Local Plan position as an appendix to this letter – please see **Appendix A**.

Other Reports

A number of the original reports referred to the proposals for the new HQ office building plus a number of commercial buildings; the current proposals have removed the commercial buildings and are for the new HQ office building only. Due to the significant time elapsed since these reports were issued it is now not possible to have these updated; however, all the requirements stated in the reports for the HQ office building remain relevant.

Appendix A

Planning Policy

This section sets out the key relevant planning policy at national and local levels. Section 7 sets out how the proposals accord with these policies.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

This section will firstly note the national policies of relevance before focusing on the local policies considered of most relevance to the consideration of the proposals for the site. Section 7 will then discuss the principle of development, as it relates to the relevant policies and why the scheme is considered acceptable when taking account of the adopted plan as a whole and material planning considerations.

National Planning Policy Framework and Guidance

The most recent version of the National Planning Policy Framework (NPPF) was published in December 2024 and continues to establish a presumption in favour of sustainable development.

Paragraph 2 states that the NPPF is a material consideration in planning decisions.

Section 2. Achieving sustainable development, paragraph 7 notes that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner.

Paragraph 8 confirms that there are three dimensions to sustainable development:

- economic (building a strong, competitive economy);
- social (providing the supply of housing required to meet needs and creating a high quality-built environment); and
- environmental (protecting and enhancing the natural, built and historic environment).

Paragraph 9 confirms that these roles should be delivered through the preparation and implementation of plans and the application of policies, considering local circumstances to reflect the need and opportunities in each area.

Paragraph 11 stresses that plans and decisions should apply a presumption in favour of sustainable development. Development plans should positively seek opportunities to meet the development needs of the area, and proposals should accord with an up-to-date development plan.

Paragraph 20 notes that Strategic Policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes (including affordable housing), employment, retail, leisure and other commercial development.

In terms of determining applications, **Policy 4. Decision Making, paragraph 39** of the NPPF sets out that it is a requirement that Local Planning Authorities should approach decisions in a positive and creative way. This paragraph also states that Planning Authorities should work proactively with applicants to ensure that developments will improve the economic, social and environmental conditions, whilst seeking to approve applications for sustainable development where possible.

Paragraph 56 notes that Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.

Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable,

precise and reasonable in all other respects.

Section 6, Building a strong, competitive economy, Paragraph 85 states:

‘significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.’

Paragraph 86 states that planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Paragraph 87 notes that Planning policies and decisions should recognise and address the specific locational requirements of different sectors, including the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

Section 7, Ensuring the Vitality of Town Centres, paragraph 92 states that when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.

Section 9, Promoting sustainable transport, paragraph 109 notes that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This includes:

- making transport considerations an important part of early engagement with local communities;
- understanding and addressing the potential impacts of development on transport networks;
- identifying and pursuing opportunities to promote walking, cycling and public transport use;
- identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Paragraph 110 further states that:

- “...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health....”

Paragraph 112 relates to local parking standards and states that the accessibility of the development, the type, mix and use of development, the availability of and opportunities for public

transport and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles should all be taken into account.

Section 11, Making Effective Use of Land, Paragraph 125(c) states that weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Paragraph 129 states decisions should support development that makes efficient use of land taking into account:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) Local market conditions and viability;
- c) The availability and capacity of infrastructure and services;
- d) The desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change; and
- e) The importance of securing well-designed, attractive and healthy places.

Design is covered in **Section 12 Achieving well-designed places**, where the Government attaches great importance to the design of the built environment. This policy highlights that good design is a key aspect of sustainable development, which should be indivisible from good planning, which in turn should contribute positively to making places better for people.

Section 14. Meeting the challenge of climate change, flooding and coastal change, paragraph 172 states that all plans should apply a sequential, risk-based approach to the location of the development – taking into account the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;
- c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

Paragraph 174 informs that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

Paragraph 177 states that if it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance

Section 15, Conserving and enhancing the natural environment, Paragraph 198 states that Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development and limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Heritage is covered in **Section 16, Conserving and enhancing the historic environment; paragraph 207** states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation

Local Planning Policy

HBC have been involved in developing a new local plan which will ultimately replace the adopted Core Strategy and Allocation plan. After going through multiple stages of consultation, concerns were raised by the Inspector and the emerging local plan was withdrawn in 2021.

HBC are now working on a new Local Plan, which is currently out for consultation until July 2025, but until this plan is adopted the existing Core Strategy and Allocations Plans will remain in place and relevant.

Given the early stage of the plan and that it has not yet been tested at examination, its weight in decision making remains negligible.

Havant Borough Local Plan (Adopted)

The current adopted Havant Borough Local Plan consists of the Local Plan Core Strategy (March 2011) and the Local Plan Allocations (July 2014). The key policies relevant to this planning application are summarised below.

The Local Plan continues to include the site within the built-up area of Havant where new development is encouraged, as acknowledged in the pre-application responses received from HBC officers.

Policy AL1 Presumption in Favour of Sustainable Development states that when considering development proposals, HBC will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). It will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Havant Borough Allocations (July 2014)

Policy HB2 Havant & Bedhampton Employment Allocations identifies the site as allocated for employment development, under **BD14 – Solent Road North**:

Policy HB2 Havant & Bedhampton Employment Allocations

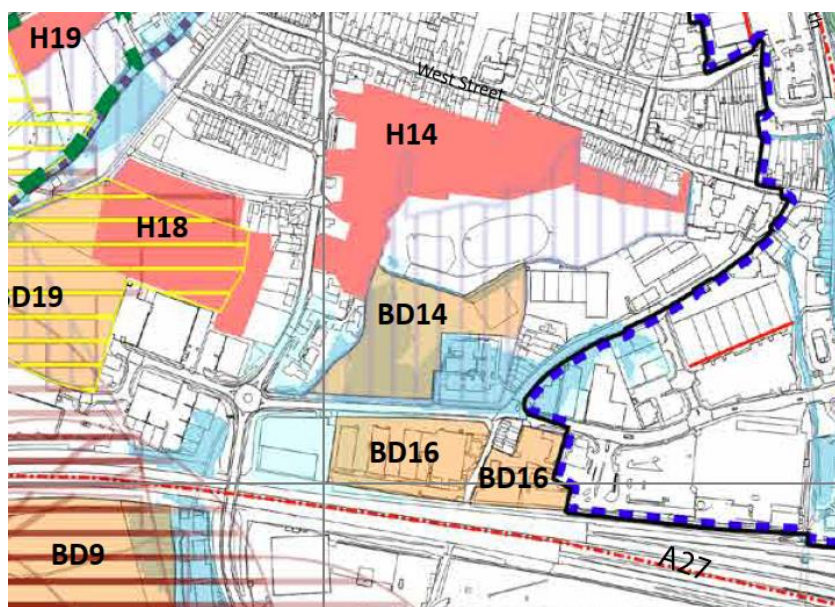
The following sites are allocated for employment development:

Ref.	Location/Address	Site area	Floorspace
BD9	Harts Farm Way North	4.19 ha	16,300 sq m
BD10	Land North of the Regional Business Centre	1.48 ha	3,500 sq m
BD11	Brockhampton West	9.41 ha	23,400 sq m
BD14	Solent Road North	1.68 ha	6,600 sq m
BD16	Solent Road South	1.88 ha	6,000 sq m
BD19	Kingscroft Farm	2.71 ha	12,000 sq m

The floorspace shown for each site is indicative, based on site area, access arrangements and other environmental constraints. Planning permission will be granted provided that detailed proposals:

1. Are broadly consistent with the indicative provision for floorspace.
2. Take account of all site specific development requirements set out in the relevant site profile.

Site Name: Solent Road North	Site Ref/Policy Number: BD14
Description of Site: A greenfield site located close to Havant Town Centre and other employment areas.	
Known Constraints: • Uncertain for waders • Much of the site is located in Flood Zones 2 and 3 and future Fluvial Flood Zone 3 • Brockhampton Stream flows along western boundary • Potential for previously unidentified archaeological deposits	
Existing Transport Provision: • Within walking distance of Havant Bus and Train Stations	
Existing Accessibility to Local Services/Facilities: • Within walking distance of Havant Town Centre and facilities	
Site Opportunities: • It could provide 6,600 square metres of new office floorspace and 548 new jobs • Potential to relocate Portsmouth Water Company's existing headquarters	
Policy BD14 - Site Specific Development Requirements: • Flood Risk Assessment to show development is safe over its lifetime and does not result in a loss of flood water storage • A five metre buffer running along Brockhampton Stream will be kept free from development, roads and other significant structures/land raising • Flood Defence Consent will be required under the Southern Region Land Drainage and Sea Defence Byelaws for any structures (outfalls etc) or buildings located within 8 metres of the top of the bank of the Brockhampton Stream as it is designated as Main River • Mitigate any impacts on Brent Geese and/or waders (Policy DM23) • Employment and Skills Plan to support planning application • Heritage Statement may be required on the advice of Hampshire County Council, to support planning application	



Havant Borough Core Strategy (March 2011)

Until the new Havant Borough Local Plan is adopted, the Local Plan (Core strategy) and Local Plan (Allocations) remain in place.

Policy CS1(8) Health and Wellbeing supports development that encourages pedestrian and cycle movements.

Policy CS2 Employment seeks to accommodate flexibly a net total of 162,000 square metres of new employment floorspace between 2006 and 2026 as follows:

- 75,000 square metres of B1 offices
- 45,500 square metres of B2 manufacturing
- 41,500 square metres of B8 warehousing.

Policy C6 (1C) Regeneration of the Borough promotes developments which positively contributes by type of use and design and by its comprehensive approach to the social, economic and/or physical regeneration of the whole borough; particularly when it is focused in the following places:

- 1d - Connectivity between Solent Road and West Street.

Policy CS8 Community Safety seeks to promote community safety through good design, natural surveillance and well-lit routes.

Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough states that planning permission will be granted for development that recognises the importance of the borough's natural and heritage assets.

Policy CS13 Green Infrastructure seeks to maintain, manage, incorporate and improve existing and new green infrastructure provision.

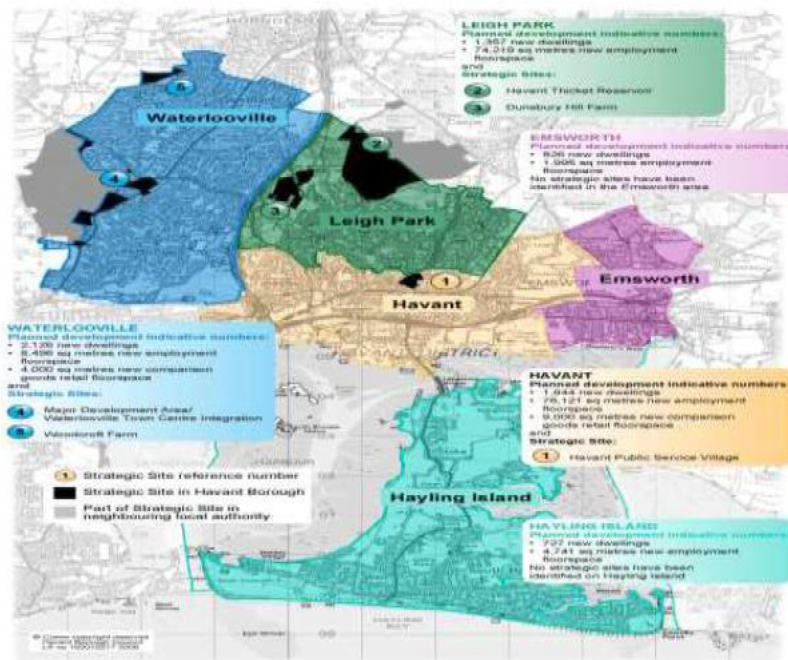
Policy CS14 Efficient Use of Resources promotes the efficient use of resources through the use of renewable energy, efficient building design and sustainable construction.

Policy CS15 Flood and Coastal Erosion Risk states that in areas where there is a risk of flooding now and in the future as identified on the latest Environment Agency flood risk maps and Strategic Flood Risk Assessment climate change maps, a site-specific flood risk assessment will be required to demonstrate that the development will be safe, including the access, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

It goes on to state that all development will be required to ensure that there is no net increase in surface water run-off. Priority should be given to incorporating Sustainable Drainage Systems (SuDS) to manage surface water drainage, unless it is proven that SuDS are not appropriate. Where SuDS are provided, arrangements must be put in place for their whole life management and maintenance.

Policy CS16 High Quality Design provides detailed criteria to ensure that development is designed to a high standard to help create places where people want to live, work and relax. The policy seeks to ensure proposals reflect local context, produces a positive relationship between buildings, streets and spaces, contributes to the improvement of the public realm, meets the needs of those with disabilities, promotes mixed use developments, mitigates negative environmental impacts through sustainable design and adapts to the changing needs of users and the changing climate over the lifespan of the building.

Policy CS17 Concentration and Distribution of Development within the Urban Areas seeks to prioritise development on previously developed land, including redundant, derelict or underused land and buildings within the urban area. Concentrates new housing, employment, retail, leisure and other development within the five urban areas of Havant, Leigh Park, Waterlooville, Emsworth and Hayling Island and broadly distributes the new housing and employment development in the five areas of the borough as indicated on the Spatial Distribution Map.



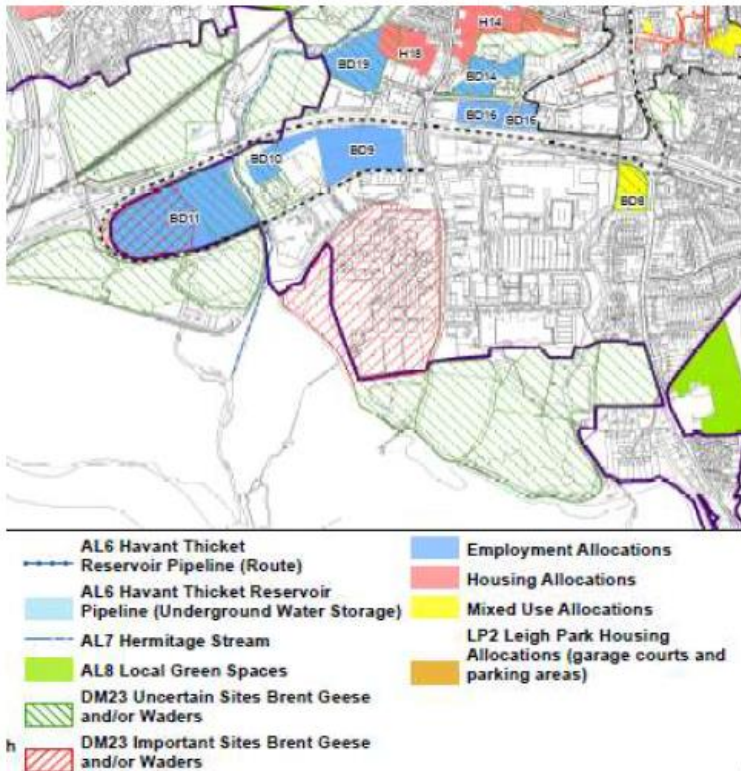
Spatial Distribution Map (Key Diagram)

Policy CS19 Effective Provision of Infrastructure seeks to ensure that there is an effective use of existing infrastructure; opportunity for co-location of facilities; proven need for additional infrastructure; accessible facilities; multifunctional use of facilities; safeguards the requirements of infrastructure providers and does not result in loss of flood protection, education, health, social and other publicly-provided community buildings, structures or services, except where it is part of a service provider's plans to provide improved local services in equally accessible locations.

Policy CS20 Transport and Access Strategy promotes development which, amongst other things, improves accessibility to goods, services and employment; does not increase congestion and promotes better use of existing transport networks; ensures that highway design responds positively to the characteristics of the area and delivers a high-quality public realm for all users and maintains or improves the range of transport modes accessible to the users of the development site with specific emphasis on public transport, especially high quality/frequency buses and includes walking and cycling where appropriate.

Policy CS21 Developer Requirements sets out the on-site, off site and financial contributions which will be sought to support infrastructure provision in the borough.

Policy E14 is concerned with the local ecological network. It states that all development is expected to protect, conserve and enhance the local ecological network through providing a net gain in biodiversity, assessing the ecological value of the site and providing a mitigation plan. In addition, development which have the potential to impact on an international nature conservation designation will be subject to a Habitats Regulations Assessment.



DM6 Coordination of Development - It is important that the most effective use is made of urban land and to ensure allocated sites can be delivered. Improvements and regeneration opportunities within urban areas will be accommodated through more efficient use of land.

DM8 Conservation, Protection and Enhancement of Existing Natural Features – states that development will only be permitted where it protects and enhances local habitats and landscape distinctiveness and which addresses all of the relevant criteria as set out below:

1. Protects natural features of nature conservation and/or amenity importance on the site, for example trees, woodlands, hedgerows, soils, streams, stream corridors, springs, ditches or ponds from damage, destruction and a deterioration in quality.
2. Sympathetically incorporates existing features into the overall design of the scheme including measures taken to ensure their continued survival.
3. Provides new landscape works that integrate successfully with the local environment and existing natural features, using local materials and plant species and making provision for future maintenance of new landscape works associated with new developments.
4. Ensures sequences of greenspaces are maintained and protects the attractiveness and visual amenity of all green open spaces that contribute to the identity of the borough.

DM11 Planning for More Sustainable Travel states that the council will seek to ensure that every opportunity is taken to increase integration of sustainable travel modes and availability of non-motorised modes by appropriate measures.

DM14 Car and Cycle Parking on Development (excluding residential) Development will only be permitted where it provides parking for cars, motorcycles and cycles in accordance with the relevant standards. Such parking provision must be appropriately located in relation to the development and be practical for its intended use.

DM18 Protecting New Development from Pollution states that planning permission will be granted for development provided that projected levels of air, noise, vibration, light, water or other pollution do not have significant negative affect on the amenity of future occupiers or users of the proposed development.

Policy DM20 Historic Assets states that planning permission will be granted for development that conserves and enhances the historic assets of Havant Borough and which sets out the impact of the development on the heritage assets and mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets. The policy sets out the development management requirements for planning applications that affect, or have the potential to affect, heritage assets.

Policy DM23 Sites for Brent Geese and Waders states that planning permission will be granted for developments that avoid important sites for Brent Geese and/or waders outside of the statutory designated areas, identified on the Policies Map.